

by means of actual and threatened force, violence, and fear of injury, immediate and future, that is the defendants used, carried, displayed, possessed, and brandished a firearm at S.H.D.

2. All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
18 U.S.C. § 1951(a)
Hobbs Act Robbery

3. On or about August 20, 2021, in the Western District of Virginia, the defendants,

[REDACTED] QUINCEY LAMONT BROCK, [REDACTED]
[REDACTED] did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendants did unlawfully attempt to take and obtain cash and other goods from S.H.D., against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, that is the defendants used, carried, displayed, possessed, and brandished a firearm at S.H.D.

4. All in violation of Title 18, United States Code, Section 1951(a).

COUNT THREE
18 U.S.C. § 924(c)
Use of Firearm in the Commission a Hobbs Act Robbery

5. On or about August 20, 2021, in the Western District of Virginia, the defendants,

[REDACTED] QUINCEY LAMONT BROCK, [REDACTED]
[REDACTED] did knowingly use, carry, possess, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted

in a court of the United States, that is, Hobbs Act Robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Two of this Indictment.

6. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR
18 U.S.C. § 1512(b)(2)(A)
Witness Tampering

7. On or about January 6, 2022 to January 11, 2022 in the Western District of Virginia, the defendant, [REDACTED] did knowingly attempt to corruptly persuade J.M. to testify falsely and withhold testimony in the grand jury, an official proceeding.

8. All in violation of Title 18, United States Code, Section 1512(b)(2)(A).

COUNT FIVE
18 U.S.C. § 1503
Obstruction of Justice

9. From on or about January 6, 2022, to January 11, 2022, in the Western District of Virginia, the defendant, [REDACTED] did corruptly influence, obstruct and impede, and endeavored to influence, obstruct and impede, the due administration of justice in *In re Treesdale Apartments Robbery*, in the grand jury for the U.S. District Court for the Western District of Virginia, by attempting to influence, manipulate, and prevent the testimony of J.M.

10. All in violation of Title 18, United States Code, Section 1503.

A TRUE BILL, this 20th day of January, 2022.

/s/FOREPERSON
FOREPERSON



CHRISTOPHER R. KAVANAUGH
UNITED STATES ATTORNEY